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Netflix, Inc., and
Netflix Worldwide Entertainment, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

FIONA HARVEY.

Plaintiff,

V.

NETFLIX, INC., and NETFLIX
WORLDWIDE ENTERTAINMENT,
LLC.

Defendants.

|Case No. 2:24-cv-04744-RGK-AJR

**[PROPOSED] ORDER GRANTING
DEFENDANTS' APPLICATION
FOR LEAVE TO FILE
DOCUMENTS IN SUPPORT OF
DEFENDANTS' SPECIAL MOTION
TO STRIKE UNDER SEAL**

Hon. R. Gary Klausner

1 [PROPOSED] ORDER

2 This matter is before the Court on Defendants Netflix, Inc. and Netflix
3 Worldwide Entertainment, LLC's (collectively, "Netflix" or "Defendants")
4 Application for Leave to File Documents in Support of Defendants' Special
5 Motion to Strike Under Seal, pursuant to Local Rule 79-5.2.2(a).

6 Having considered Defendants' Application for Leave to File Documents
7 Under Seal and the Declaration of Marvin S. Putnam in Support of Defendants'
8 Application for Leave to File Documents in Support of Defendants' Special
9 Motion to Strike Under Seal, the Court finds that compelling reasons justify
10 sealing the below-referenced materials because those materials contain third party
11 personally identifiable information and/or information that might become a vehicle
12 for improper purposes. *See Activision Publ'g, Inc. v. EngineOwning UG*, 2023
13 WL 2347134, at *1 (C.D. Cal. Feb. 27, 2023); *Stiner v. Brookdale Senior Living, Inc.*, 2022 WL 1180216, at *2 (N.D. Cal. Mar. 30, 2022); *Kamakana v. City & Cnty. of Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006); *United States v. Amodeo*, 71 F.3d 1044, 1050 (2d Cir. 1995); *Mendiola v. Regents of Univ. of California*, 2021 WL 9721281, at *1 (C.D. Cal. Dec. 1, 2021); *Opperman v. Path, Inc.*, 2017 WL 1036652, at *4 (N.D. Cal. Mar. 17, 2017); *Altemus v. Amazon.com Servs. LLC*, 2024 WL 1078245, at *2 (S.D. Cal. Mar. 12, 2024).

20 The application is hereby **GRANTED**. Accordingly, the following
21 documents and portions of documents shall be filed under seal:

| 23 Document | 24 Portions to be sealed |
|---|--------------------------|
| 25 Declaration of Richard Gadd 26 in Support of Defendants' 27 Special Motion to Strike 28 ("Gadd Decl."), Exhibit 1 | Redacted portions |
| Gadd Decl., Exhibit 2 | Redacted portions |
| Gadd Decl., Exhibit 3 | Redacted portions |
| Gadd Decl., Exhibit 4 | Redacted portions |

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| 1 | Gadd Decl., Exhibit 5 | Redacted portions |
| 2 | Gadd Decl., Exhibit 6 | Redacted portions |
| 3 | Gadd Decl., Exhibit 7 | Redacted portions |
| 4 | Gadd Decl., Exhibit 8 | Redacted portions |
| 5 | Gadd Decl., Exhibit 9 | Redacted portions |
| 6 | Gadd Decl., Exhibit 10 | Redacted portions |
| 7 | Gadd Decl., Exhibit 11 | Redacted portions |
| 8 | Gadd Decl., Exhibit 12 | Redacted portions |
| 9 | Gadd Decl., Exhibit 13 | Redacted portions |
| 10 | Gadd Decl., Exhibit 14 | Redacted portions |
| 11 | Gadd Decl., Exhibit 15 | Redacted portions |
| 12 | Gadd Decl., Exhibit 16 | Redacted portions |
| 13 | Gadd Decl., Exhibit 17 | Redacted portions |
| 14 | Gadd Decl., Exhibit 18 | Redacted portions |
| 15 | Gadd Decl., Exhibit 19 | Redacted portions |
| 16 | Gadd Decl., Exhibit 20 | Redacted portions |
| 17 | Gadd Decl., Exhibit 21 | Redacted portions |
| 18 | Gadd Decl., Exhibit 22 | Redacted portions |
| 19 | Gadd Decl., Exhibit 23 | Redacted portions |
| 20 | Gadd Decl., Exhibit 24 | Redacted portions |
| 21 | Gadd Decl., Exhibit 25 | Redacted portions |
| 22 | Gadd Decl., Exhibit 26 | Redacted portions |
| 23 | Gadd Decl., Exhibit 27 | Redacted portions |
| 24 | Gadd Decl., Exhibit 28 | Redacted portions |
| 25 | Gadd Decl., Exhibit 29 | Redacted portions |
| 26 | Gadd Decl., Exhibit 30 | Redacted portions |
| 27 | Gadd Decl., Exhibit 31 | Redacted portions |
| 28 | Gadd Decl., Exhibit 32 | Redacted portions |
| | Gadd Decl., Exhibit 33 | Redacted portions |
| | Gadd Decl., Exhibit 34 | Redacted portions |
| | Gadd Decl., Exhibit 35 | Redacted portions |
| | Gadd Decl., Exhibit 36 | Redacted portions |
| | Gadd Decl., Exhibit 37 | Redacted portions |
| | Gadd Decl., Exhibit 38 | Redacted portions |
| | Gadd Decl., Exhibit 39 | Redacted portions |
| | Gadd Decl., Exhibit 40 | Redacted portions |
| | Gadd Decl., Exhibit 41 | Redacted portions |
| | Gadd Decl., Exhibit 43 | Redacted portions |
| | Gadd Decl., Exhibit 44 | Redacted portions |
| | Gadd Decl., Exhibit 45 | Entire exhibit |

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| 1 | Gadd Decl., Exhibit 46 | Redacted portions |
| 2 | Gadd Decl., Exhibit 47 | Entire exhibit |
| 3 | Gadd Decl., Exhibit 48 | Redacted portions |
| 4 | Gadd Decl., Exhibit 49 | Entire exhibit |
| 5 | Gadd Decl., Exhibit 50 | Entire exhibit |
| 6 | Gadd Decl., Exhibit 51 | Redacted portions |
| 7 | Gadd Decl., Exhibit 53 | Redacted portions |
| 8 | Gadd Decl., Exhibit 54 | Redacted portions |
| 9 | Gadd Decl., Exhibit 55 | Redacted portions |
| 10 | Gadd Decl., Exhibit 56 | Redacted portions |
| 11 | Gadd Decl., Exhibit 57 | Redacted portions |
| 12 | Gadd Decl., Exhibit 58 | Redacted portions |
| 13 | Gadd Decl., Exhibit 59 | Redacted portions |
| 14 | Gadd Decl., Exhibit 60 | Redacted portions |
| 15 | Declaration of Laura Wray in Support of Defendants' Special Motion to Strike, Exhibit 7 | Redacted portions |
| 16 | Declaration of Richard Gadd in Support of Defendants' Special Motion to Strike, paragraph 65 | Redacted portions |

17 **IT IS SO ORDERED.**

18 Dated: _____, 2024

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20 Hon. R. Gary Klausner
21 United States District Judge

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